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October 11, 2011

**BY MESSENGER AND FILED ON CM/ECF SYSTEM**

The Honorable James M. Peck  
United States Bankruptcy Judge  
United States Bankruptcy Court  
One Bowling Green  
New York, New York 10004

*In re Lehman Brothers Holdings Inc., et al.*  
Case No. 08-13555 (JMP) (Jointly Administered)

*Lehman Brothers Holdings Inc., et al. v. Nomura International plc*  
Adv. Proc. No. 10-03228 (JMP)

*Lehman Brothers Holdings Inc., et al. v. Nomura Securities Co., Ltd.*  
Adv. Proc. No. 10-03229 (JMP)

Dear Judge Peck:

We represent Nomura International plc (“NIplc”), Nomura Securities Co., Ltd. (“NSC”), and Nomura Global Financial Products, Inc. (“NGFP,” together with NIplc and NSC, “Nomura”) in the above-referenced actions. By letter dated September 27, 2011, we requested a conference with the Court pursuant to Local Bankruptcy Rule 7007-1(b) to address a dispute regarding the scope of document discovery that Nomura is entitled to receive from the Debtors. We write to request (with the consent of the Debtors) that the Court schedule the pre-motion conference for October 26, 2011 (or at the Court’s earliest convenience thereafter if October 26 is not convenient).

By way of background, the Court entered a Stipulation and Order staying these proceedings on May 23, 2011, so that the parties could attempt to resolve their disputes through negotiations. On September 23, 2011, the Debtors filed a notice lifting the stay and restarting the litigation. On September 27, 2011, we requested the pre-motion conference to address a critical discovery

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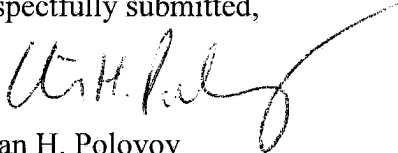
issue (Dkt. Nos. 20306, 20348, 20380.) JPMorgan Chase Bank, N.A., Citibank N.A. and related entities, and Credit Suisse AG and related entities filed letters with the Court expressing their views on the discovery dispute and requesting the opportunity to be heard at the pre-motion conference. (Dkt Nos. 20498, 20570, 20580, 20588.)

We are unable to agree to the Debtors' request that we withdraw the proposed motion to compel. We have, however, discussed with the Debtors our clients' willingness to adjourn the requested pre-motion conference for a brief period if the Debtors would agree to intensive negotiations during this period aimed at resolving this lawsuit (and to adjourn the schedule of the litigation). We have agreed with the Debtors that we would ask the Court to adjourn the requested pre-motion conference until October 26 in return for the Debtors' (1) agreeing to a period of intensive negotiations beginning on Tuesday, October 11 and continuing for two weeks, and (2) representing that they will not bring any estimation proceedings as to the Nomura entities' claims before March 15, 2012, if at all. The parties further agreed to a 60 day extension of the litigation schedule, and we have today filed a notice of presentment of a stipulated scheduling order memorializing that extension.

Accordingly, the parties respectfully request that the Court schedule the pre-motion conference for October 26, 2011 (or at the Court's earliest convenience thereafter if October 26 is not convenient).

Please have your Chambers contact me should you have any questions.

Respectfully submitted,



Brian H. Polovoy

cc: William J. Hine, Esq.  
David S. Cohen, Esq.